

**REMARKS/ARGUMENTS**

Reconsideration and allowance of this application are respectfully requested. Currently, claims 1-26 are pending in this application.

**Priority Documents:**

Attached is a certified copy of the priority documents. Applicant requests acknowledgment of Applicant's claim for priority under 35 U.S.C. §119 and receipt of the priority documents.

**Rejection Under 35 U.S.C. § 112**

Claims 1-3 and 6 were rejected under 35 U.S.C. § 112, second paragraph as allegedly being indefinite. Applicant traverses this rejection.

Claims 1, 6 and 7 were editorially amended to require "the a predetermined number of frames" and thus this claim element has a proper antecedent basis.

The Office Action states that "the limitation 'ratio is shortened irrespective of whether or not said player character has moved;' This limitation does not allow one skilled in the art to understand the bounds of the claim when read in light of the specification, the examiner does not understand how the virtual camera location would move without the said player character moving." Page 4, lines 13-16 of the specification clarifies the meaning of this limitation as follows "That is, the virtual-camera-location updating means (36, S41, S43, S45, S61, S63, S65) repeatedly updates the location of the virtual camera (84) irrespective of a case that the player character (80) *continues* stopping or a case of *continuing* moving after being moved (emphasis added)." To provide even further clarity, claim 1 has been amended to require "ratio is shortened irrespective of whether or not said player character has continued to moved." This amendment appears to be consistent with the Office Action's assumption that "the ratio between the location of said virtual camera and the target location is shortened once the player character has stopped moving."

Applicant thus requests that the rejection of claims 1-3 and 6 under 35 U.S.C. § 112, second paragraph be withdrawn.

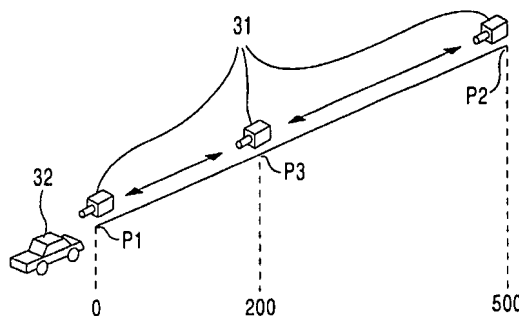
**Rejection Under 35 U.S.C. § 102:**

Claims 1-7 were rejected under 35 U.S.C. §102 as allegedly being anticipated by Mizumoto (U.S. Patent No. 6,409,597). Applicant traverses this rejection.

Anticipation under Section 102 of the Patent Act requires that a prior art reference disclose every claim element of the claimed invention. See, e.g., *Orthokinetics, Inc. v. Safety Travel Chairs, Inc.*, 806 F.2d 1565, 1574 (Fed. Cir. 1986). Mizumoto fails to disclose every claim element of the claimed invention. For example Mizumoto fails to disclose “updating in order a location of said virtual camera in such a manner that a distance from said target location to a reference location determined in a predetermined manner toward the location of said virtual camera at a predetermined ratio is shortened irrespective of whether or not said player character has continued to move (emphasis added),” as required independent claim 1 and its dependents. Similar comments apply to independent claims 6-7.

Mizumoto discloses automatically changing the viewpoint provided by a virtual camera in accordance with a condition of a game character such as a moving car. A viewpoint 31 is positioned above and behind the car. A closest viewpoint to the car (from the virtual camera) corresponds to 0 points and the farthest viewpoint to the car (from the virtual camera) corresponds to 500 points. The default or normal viewpoint corresponds to 200 points. (See Fig. 5 reproduced below). The change from one viewpoint to another, based on a certain condition being satisfied, is made at a constant predetermined moving speed MS for that condition.

FIG. 5



Mizumoto's conditions which, when satisfied, result in a change in viewpoint include: the car has crashed (Fig. 6), the car approaches an obstacle (Figs. 7-8), the car enters another object

such as a warehouse (Figs. 9-10) or alley (Figs. 11-13), the car has spun, and the car or enemy car is a tagger and the other car is detected. For example, if the car has crashed, the viewpoint will be changed from its current position to a distance of 0 points (P1 in Fig. 5 above) at the constant rate of 4 points per frame.

Mizumoto discloses many other examples of changing viewpoint to a predetermined distance of points at a predetermined rate of points per frame. However, none of Mizumoto's conditions, when satisfied, results in shortening the viewpoint "at a predetermined ratio...irrespective of whether or not said player character [Mizumoto's car] has continued to move" as claimed. In particular, Mizumoto's disclosure of a predetermined constant rate (e.g., changing from a current viewpoint position to a new viewpoint P1 at the rate of 4 points per frame) does not disclose or suggest "a predetermined ratio" as claimed.

As an example of "updating in order a location of said virtual camera in such a manner that a distance from said target location to a reference location determined in a predetermined manner toward the location of said virtual camera at a predetermined ratio is shortened...", the present specification discloses changing the distance between a target location and a new reference location (e.g., camera location) to  $\Delta d' = \Delta d \times 80\%$  in one frame and then to  $\Delta d'' = \Delta d \times 80\% \times 80\%$  in the next frame. (See Figs. 5-6 and 10-11 in the present application). Exemplary embodiments described in the present specification thus set a new virtual camera location in accordance with a predetermined ratio (80% for example) of the distance between the target location and current reference location (e.g., camera location). This predetermined ratio is not disclosed by Mizumoto's constant moving speed. For example, the predetermined ratio enables the moving speed of the camera to be variable, not fixed or constant as in Mizumoto. Specifically, the farther the distance between the target location and the reference location (e.g., camera location), the faster the moving speed of the camera, and the closer the distance, the slower the moving speed.

Accordingly, there is a clear difference between "a predetermined ratio" as claimed and a constant rate of change in viewpoint as disclosed by Mizumoto. In Mizumoto, the movement of the viewpoint is controlled based on the moving speed that is determined in advance. In contrast,

the viewpoint provided by the virtual camera in the present invention is controlled in accordance with distance between the target location and the reference location (e.g., camera location).

Moreover, while Mizumoto discloses a maximum viewpoint distance corresponding to 500 points, Mizumoto fails to disclose “forcedly updating said reference location to a location within the maximum distance that uses said target location as a reference when determined by said distance determining programmed logic circuitry that the distance is rendered longer than said maximum distance,” as required by dependent claim 4 or “determin[ing] whether or not said updated reference location calculated by said reference-location calculating programmed logic circuitry is rendered longer than the maximum distance from said target location,” as required by dependent claim 5. The Office Action apparently alleges that portions of the abstract, cols. 1-3 and 7-9 disclose these limitations, but Applicant fails to comprehend how any of these portions of Mizumoto discloses the above noted limitations. For example, none of these portions of Mizumoto discloses updating a reference location to a location within 500 points that uses the target location as a reference when it is determined by the distance determining programmed logic circuitry that the distance is rendered longer than 500 points.

### **New Claims**

New claims 8-26 have been added to provide additional for the invention. New claim 8 requires, *inter alia*, “a virtual-camera-location updating programmed logic circuitry for sequentially updating, on a frame by frame basis, a location of said virtual camera in such a manner that a distance between said target location and a reference location that is determined with respect to the location of said virtual camera is made smaller at a predetermined ratio per frame irrespective of whether or not said player character has continued to move.”

New claim 13 requires, *inter alia* “a virtual-camera-location updating programmed logic circuitry for sequentially updating, on a frame by frame basis, a location of said virtual camera in such a manner that a distance from said target location to a reference location that is determined with respect to the location of said virtual camera is made smaller at a predetermined ratio per frame irrespective of whether or not said player character has continued to move.”

New claim 14 requires, *inter alia*, “(c) sequentially updating, on a frame by frame basis, a location of said virtual camera in such a manner that a distance from said target location to a

reference location that is determined with respect to the location of said virtual camera is made smaller at a predetermined ratio per frame irrespective of whether or not said player character has continued to move.” Accordingly, new claims 8, 13 and 14 are allowable.

New claim 15 requires “wherein a moving speed of the virtual camera is variable and is determined based on said determined distance.” These features are supported by, for example, Figs. 5-12 of the present application. For example, Figs. 5-6 and 11-12 demonstrate the camera location moving a certain distance in a first frame, and then moving a different distance in a second frame. Since the distance is moved from one frame to the next frame are different, the moving speed of the virtual camera varies. Similar comments apply to claims 17, 19, 21, 23 and 25.

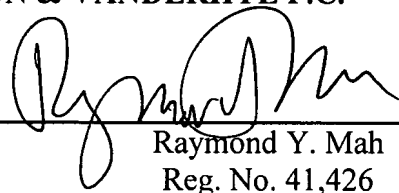
**Conclusion:**

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

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